

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

Case No. 9:24-cv-80395-RLR-BER

GREENFLIGHT VENTURE CORPORATION,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

**DEFENDANT GOOGLE, LLC’S MOTION
FOR EXTENSION OF TIME TO RESPOND TO AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1(a)(1)(J), Defendant Google, LLC (“Google”) respectfully requests the entry of an order extending its deadline to respond to Plaintiff’s Amended Complaint by two weeks, though September 10, 2024, and in support thereof Google states as follows:

1. On April 1, 2024, Dr. Jeffrey Isaacs (“Isaacs”) filed a *pro se* Complaint against Google. D.E. 1. The Complaint asserted a single count for patent infringement. *See id.*
2. On July 30, 2024, Google moved to dismiss the complaint under Fed. R. Civ. P. 12(b)(1) and Fed. R. Civ. P. 12(b)(6). D.E. 16.
3. On August 13, 2024, Isaacs and new plaintiff Greenflight Venture Corporation filed the First Amended Complaint. D.E. 24. The First Amended Complaint seeks class action status and alleges six causes of action, including one claim of patent infringement, and five claims under the Sherman Act and unfair competition laws. *See id.* ¶¶ 98-170. The First Amended Complaint contains at least 29 pages of new matter not in the original Complaint.
4. On August 14, 2024, the Court granted Google’s motion to dismiss, dismissed

Isaacs's patent infringement claims and class action claims, and severed and stayed Isaacs's *pro se* Sherman Act claim. Following the Court's order, "the only active claims in this case are the claims brought by Greenflight Venture." D.E. 26 ¶ 11.

5. In view of the new plaintiff and new claims in this action, Google respectfully requests an extension of time to respond to the First Amended Complaint by two weeks, through September 10, 2024, to provide adequate time to investigate the allegations.

6. This motion is made in good faith and not for the purposes of delay. The brief extension requested will not prejudice any party.

WHEREFORE, Google respectfully requests that the Court enter an order extending the deadline for it to respond to the First Amended Complaint through September 10, 2024.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), the undersigned counsel certifies that counsel for Google conferred with counsel for Plaintiff Greenflight Venture regarding the requested relief and that they oppose.

Dated: August 15, 2024

Respectfully submitted,

By: /s/ Ana M. Barton

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Counsel for Google, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically filed with the Clerk of Court and served via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel of record, on this 15th day of August, 2024.

By: /s/ Ana M. Barton
Ana M. Barton